## DOCKET SECTION

# BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

Hov 14 | 53 PH '97

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Docket No. R97

Postal Rate and Fee Changes, 1997

### NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS MICHAEL R. MCGRANE (NAA/USPS-ST44-23-25) November 14, 1997

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Michael R. McGrane (USPS-ST-44) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

November 14, 1997

William B Baker

### NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS MICHAEL R. MCGRANE (NAA/USPS-ST44-23-25)

NAA/USPS-ST44-1: 23. Please refer to your response to NAA/USPS-ST44-6.

Please reconcile the volumes provided in this response with the volumes provided in LR

H-145 (the Billing Determinants) for the each of these categories of mail.

NAA/USPS-ST44-24. Please refer to your response to NAA/USPS-ST44-9. For each of the cost pools in Table 1 of Exhibit 44A, please provide a breakdown of the "direct tally IOCS" costs, the costs associated with "mixed mail" tallies, and the "not-handling-mail" costs. Please provide these costs separately for Standard A Regular ECR letters and non-letters.

NAA/USPS-ST44-25. Please refer to your response to NAA/USPS-ST44-3. Consider a mailing of ECR Basic mail that is prepared in walk-sequence, rather than line of travel sequence. Please list all possible endorsements for pieces of such a mailing, and state whether the possible endorsements differ between letters and nonletters.